

DORSEY & WHITNEY LLP  
J. Michael Keyes (SBN 262281)  
*keyes.mike@dorsey.com*  
Connor J. Hansen (*pro hac vice pending*)  
*hansen.connor@dorsey.com*  
Dylan Harlow (*pro hac vice pending*)  
*harlow.dylan@dorsey.com*  
Kayla 'Auli'ilani Ganir (*pro hac vice*)  
*ganir.kayla@dorsey.com*  
701 Fifth Avenue, Suite 6100  
Seattle, WA 98104  
Telephone: 206.903.8800  
Facsimile: 206.903.8820

DORSEY & WHITNEY LLP  
Kent J. Schmidt (SBN 195969)  
*schmidt.kent@dorsey.com*  
600 Anton Boulevard, Suite 200  
Costa Mesa, CA 92626  
Telephone: 714.800.1400  
Facsimile: 714.800.1499

*Attorneys for Plaintiff MM Games d.o.o.*

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

MM Games d.o.o.,

Plaintiff,

v.

Andre Rebelo-Soares d/b/a Typical  
Gamer, Chad Mustard, and Jogo Studios,  
Inc.

Defendants.

CASE NO. 2:25-CV-01969-GW-JPR

**NOTICE OF MOTION AND  
MOTION FOR PRELIMINARY  
INJUNCTION**

Filed concurrently with:  
1) Plaintiff's Memorandum of Points  
and Authorities in Support of Motion  
for Preliminary Injunction and;  
2) [Proposed] Order Granting Plaintiff's  
Motion for Preliminary Injunction

Hon. George H. Wu

Date: July 31, 2025  
Time: 8:30 a.m.  
Courtroom: 9D

Complaint filed: March 6, 2025

1 PLEASE TAKE NOTICE that on July 31, 2025, before the assigned  
2 Honorable Judge in a Courtroom to be determined of the United States District Court,  
3 Central District of California, Western Division, located at 350 West 1st Street, Los  
4 Angeles, California 90012, Plaintiff MM Games will, and hereby does, move the  
5 Court pursuant to Federal Rule of Civil Procedure 65 for an order granting a  
6 preliminary injunction enjoining Defendants Andre Rebelo-Soares d/b/a Typical  
7 Gamer, Chad Mustard, and Jogo Studios, Inc. (“Jogo Studios”) (collectively  
8 “Defendants”) from making additional copies of Plaintiff’s copyright protected work,  
9 distributing copies of the work, and publicly distributing copies of the work.

10 MM Games has filed a Verified First Amended Complaint in this action for  
11 copyright infringement in violation of 17 U.S.C. § 101 *et seq.* Plaintiff moves for a  
12 preliminary injunction relating to the allegations of copyright infringement. This  
13 motion is based on this Notice of Motion and Motion for Preliminary Injunction; the  
14 Verified First Amended Complaint; the concurrently filed Memorandum of Points  
15 and Authorities in Support of Motion for Preliminary Injunction; [Proposed] Order  
16 Granting Motion for Preliminary Injunction; the file and record in this case; and any  
17 additional argument that the Court may consider in connection with this matter. The  
18 criteria for issuing a preliminary injunction are met here as detailed in the  
19 concurrently filed Memorandum of Points and Authorities in Support of Motion for  
20 Preliminary Injunction.

21 The Court should enter a preliminary injunction to maintain the status quo and  
22 stop and prevent irreparable harm that will occur while this case is pending.  
23  
24  
25  
26  
27  
28

1 Dated: June 12, 2025

DORSEY & WHITNEY LLP

2  
3 By: /s/ J. Michael Keyes

4 DORSEY & WHITNEY LLP  
5 J. Michael Keyes (SBN 262281)  
6 *keyes.michael@dorsey.com*  
7 Connor J. Hansen (*pro hac vice*)  
8 *hansen.connor@dorsey.com*  
9 Dylan Harlow (*pro hac vice*)  
10 *harlow.dylan@dorsey.com*  
11 Kayla 'Auli'ilani Ganir (*pro hac vice*)  
12 *ganir.kayla@dorsey.com*  
13 701 Fifth Avenue, Suite 6100  
14 Seattle, WA 98104

15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
Kent J. Schmidt (SBN 195969)  
*schmidt.kent@dorsey.com*  
600 Anton Boulevard, Suite 200  
Costa Mesa, CA 92626  
Telephone: 714.800.1400  
Facsimile: 714.800.1499

*Attorneys for Plaintiff MM Games  
d.o.o.*

**CERTIFICATE OF SERVICE**

I hereby certify that on June 12, 2025, a true and correct copy of the foregoing was sent via mail to all parties to this action. A true and correct copy of the foregoing was also sent to opposing counsel via electronic mail.

/s/ J. Michael Keyes  
J. Michael Keyes, SBN 262281